

Ame Chain of Events Burley Seal

The first load from Salt Lake City, Utah to another ORRICO facility after the contamination entered the system was on 1/27/2010.

1/27: 8,135 gallons arrived at the EMRI facility in Portland, Oregon, and was pumped into Tank 6. The retain sample from this shipment was tested for PCBs on 2/24/10. The results were 450 ppm (270 ppm were Aroclor 1242, and 180 ppm were Aroclor 1254). The laboratory ID Number is: 1002546-02.

The next day, on 1/28, these gallons were pumped into Tank 12.

It is estimated that 60,000 gallons were processed through the re-refinery from Tank 12, and pumped into Tanks 25, 26, 27, 29, 30, 31, 10, and 19. However, due to 2 separate shut downs during the time in question within the back plant, ORRICO believes nothing was shipped out to customers from this process. Further test reports were ran on product shipped out prior to this contamination, and all came back non-detect for PCBs. The laboratory ID Number is: 1003568-01-09.

The only loads shipped directly out of Tank 12 were two loads to WBP:

2/12	7,094 gallons	Shipping Ticket Number:	02-10-0212-001
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*2/18	2,341 gallons	Shipping Ticket Number:	02-10-0218-002
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** This sample was chosen at random by EPA and ODEQ during their inspection – the split sample taken by ORRICO came back with a result of 9.29ppm. The results of this sampling alerted the compliance manager to research any shipments directly out of Tank 12.*

Date File Location

Portland/ORRICO

The second load from Salt Lake City, Utah to another ORRICO facility after the contamination entered the system was on 1/29/2010.

1/29: 5,900 gallons arrived at the EMRI facility in Portland, Oregon, (Transfer Ticket Number: 02-10-0129-001) and was pumped into Tank 13. The retain sample from this shipment was tested for PCBs on 2/23/10. The results were 310 ppm (170 ppm were Aroclor 1242, and 140 ppm were Aroclor 1254). The laboratory ID Number is: 1002492-04.

On 2/1/10, 8,456 gallons from Tank 13 were loaded onto a truck, and transferred to the Klamath Falls facility, (Transfer Ticket Number: 03-10-0201-005) and received into their Tank 3.

On that same day, 2/1, Tank 3 was transferred into Cooker D-3.

On 2/3, a total of 11,808 gallons were transferred from Cooker D-3 into Tank 6A.

A weekly production composite sample was sent to the laboratory on 2/8 to verify that the previous week's production (2/1 through 2/7) met the specifications for EPA On-Specification Used Oil Fuel. The result from this sample was 15 ppm, on laboratory ID Number: 1001800-01. The facility manager, Mr. Daniel Fisher, was the first to receive these results. Mr. Fisher took it upon himself to assume that this result was a laboratory error, and collected another sample of finished oil, and sent it to the laboratory for analysis. He sent these samples to the laboratory on 2/11 and received results showing PCBs at Non-Detect (Laboratory ID Number: 1001915-01). Based on this information, he shipped oil out from the facility on this new analytical result.

On 2/13, 6,474 gallons were shipped to Cornerstone Industrial, 3,461 gallons were from Tank 6A (Shipping Ticket Number: 03-10-0213-001).

On 2/15, 6,546 gallons were shipped to Jasper Wood Products from Tank 6A (Shipping Ticket Number: 03-10-0215-003). The delivery was made into Jasper's large storage tank. This tank is only pumped into Jasper's smaller "day" tank for usage by an ORRICO truck, as Jasper does not have the capacity to transfer this material on their own. Since it was known that no ORRICO truck had transferred this material since the delivery in question, ORRICO contacted Jasper, asked them to lock down the large storage tank as it was suspected to be contaminated. The contents of that large storage tank was collected over three separate loads, as follows:

- 2-22-2010 Transfer Ticket Number 02-10-0222-001
2,970 gallons were recovered, and pumped into Tank 5 at the EMRI Facility (an already contaminated tank).
- 2-24-2010 Receiving Record Number 02-10-0224-001
2,500 gallons were recovered, and pumped into Tank 6 at the EMRI Facility (an already contaminated tank).

- 2-26-2010 Receiving Record Number 03-10-0226-002
1,561 gallons were recovered, and pumped into Tank 5A at the Klamath Falls Facility.

On 2/16, the remainder of the contents of Tank 6A (8,336 gallons) was shipped back to the EMRI Facility (Transfer Ticket Number: 02-10-0216-002). This load was received into Tank 5 at EMRI. A retain sample from this shipment was tested for PCBs on 2/19/10. The results were 11 ppm (11 ppm were Aroclor 1242). The laboratory ID Number is: 1002333-02. This oil is currently still in Tank 5, locked down.

On 2/18, 700 gallons were delivered to Waste Management in Klamath Falls, an oil fired shop heater (Shipping Ticket Number: 03-10-0218-001).

Also on 2/18, 630 gallons were delivered to Floyd A. Boyd Company in Klamath Falls, an oil fired shop heater (Shipping Ticket Number: 03-10-0218-002).

On 2/2, 8,180 gallons from the EMRI Facility (Tank 13) were loaded onto a truck, and transferred to the Klamath Falls facility, (Transfer Ticket Number: 02-10-0202-003) and received into their Tank 4. The retain sample from this shipment was tested for PCBs on 2/19/10. The results were 230 ppm (130 ppm were Aroclor 1242, and 100 ppm were Aroclor 1254). The laboratory ID Number is: 1002334-04.

This load was pumped into both cookers D-1 and D-3 on 2/2.

(D-1 Path): On 2/4, 7,668 gallons were transferred from Cooker D-1 into Tank 7B.

(D-3 Path): On 2/5, 11,502 gallons were transferred from Cooker D-3 into Tank 7A.

Three shipments of oil from 7A and 7B were sent to the EMRI facility on 2/9, and offloaded into Tank 12.

- 2/9 8,365 gallons Transfer Ticket Number: 02-10-0209-003
- 2/9 8,855 gallons Transfer Ticket Number: 03-10-0209-006
- 2/9 8,862 gallons Transfer Ticket Number: 03-10-0209-005

On 2/11, 6,308 gallons, 1,500 gallons of which were from Tank 7A, were delivered to Dahlstrom and Watt Bulb Farm (Shipping Ticket Number: 03-10-0211-002).

Also on 2/11, 9,916 gallons were loaded onto a truck to be delivered to Blue Sky Environmental (Shipping Ticket Number: 03-10-0211-001). HOWEVER, the PCB contamination was discovered while this truck was in route to Blue Sky. The driver was re-directed to bring this load of oil back to the Klamath Falls facility, and was offloaded back into tanks known to already be contaminated.

The third load from Salt Lake City, Utah to another ORRICO facility after the contamination entered the system was on 2/03/2010.

2/3: 3,000 gallons arrived from at the EMRI facility in Portland, Oregon, (Transfer Ticket Number: 02-10-0203-001) and was pumped into Tank 13. The retain sample from this shipment was tested for PCBs on 2/25/10. The results were <1.0 ppm. The laboratory ID Number is: 1002709-01.

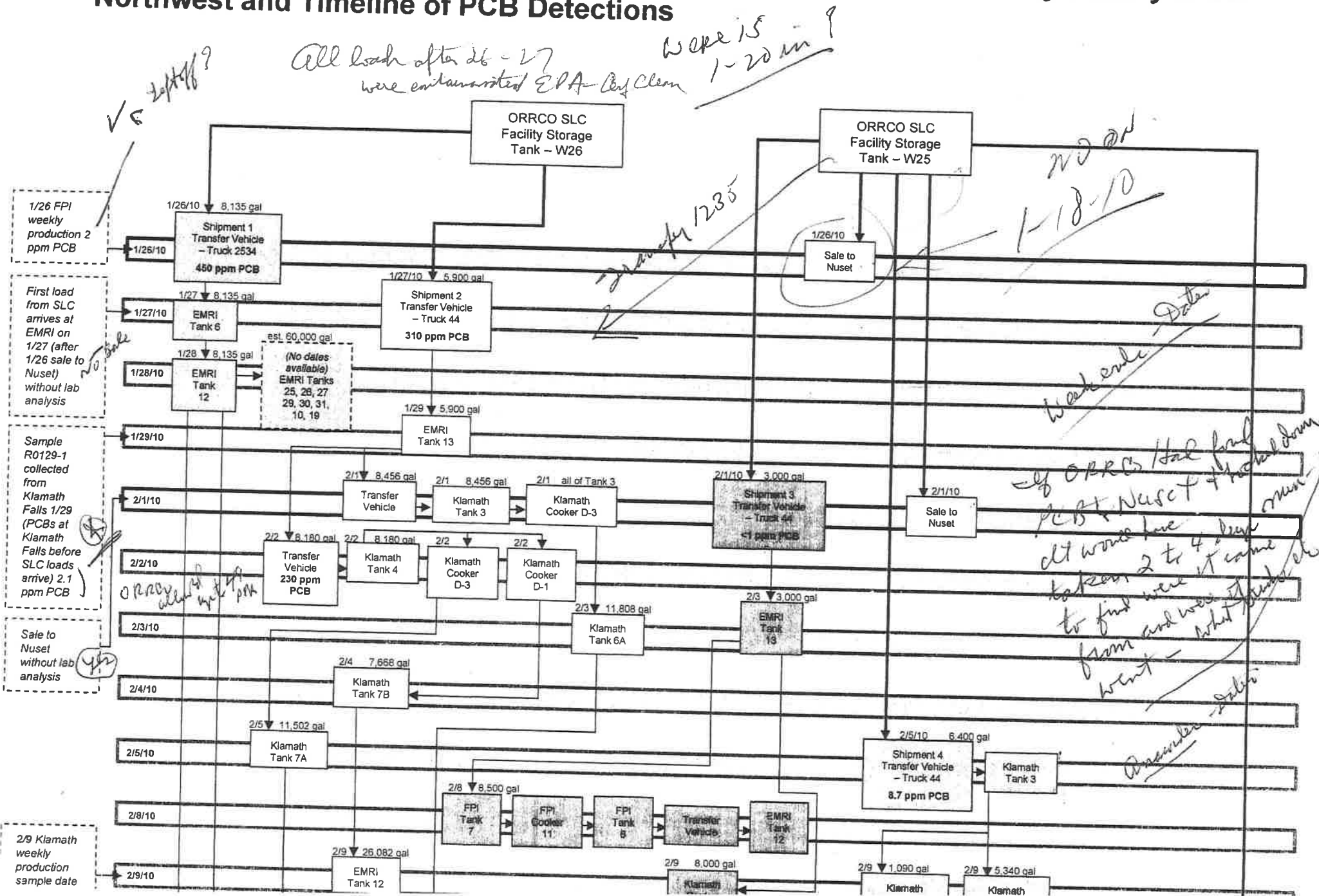
On 2/8, 8,500 gallons were transferred from Tank 13 at EMRI to the FPI facility (Transfer Ticket Number: 01-10-02-08-004) and was offloaded into their Tank 7. Tank 7 was transferred into Cooker 11, processed, then pumped into Tank 6. On 2/17, 11,492 gallons from Tank 6 were transferred back to the EMRI facility (Transfer Ticket Number: 02-10-0217-003) and pumped into Tank 12.

Also on 2/9, 8,000 gallons were transferred from EMRI's Tank 13 to Klamath Falls, (Transfer Ticket Number: 03-10-0209-002) and received into their Cooker D-3.

On 2/11, 11, 604 gallons from Cooker D-3 was transferred into Tank 7B.

On 2/22, 6,616 gallons were shipped from Tank 7B to Dahlstrom & Watt Bulb Farm (Shipping Ticket Number: 03-10-0222-001).

Figure 3 – Flow Diagram of Oil Distribution from ORRCO Salt Lake City Facility to the Northwest and Timeline of PCB Detections



Tel: 330.253.8211 Fax: 330.253.4489

Analysis Request/Chain of Custody

For Summit Environmental Technologies, Inc. use only

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SET No.

Company Name (Please Print) Oil Re-Refining		Project Name EMRI PCB-12		Grab	Composite Matrix: S=Solid, L=Liquid, O=Oil SL=Sludge, A=Air, DW=Drinking Water	Preservative	Number of Containers	Analytical Parameters and Methods							
Company Address 4150 N. Suttle Road Portland, OR 97217		Project Address						PCBs Flash point							
Client Phone No. 503-286-8352		Report to Ian Roholt													
Client Fax No. 503-286-5027		PO#													
Client Email ianr@orrc.co.biz		Quote No.													
Contact Person Ian Roholt															
Sampled by Ian Roholt		Check if Ohio VAP samples <input type="checkbox"/>													
#	Sample Identification		Date Collected	Time Collected											

1	Tank 12	8/26/10	11:00	X	0	NA	1	X	X										
1014089-01																			

Relinquished by:	Date	Time	Received by:	Date	Time
<i>Alan Rahn</i>	8/27/10	3:00 PM			
Received in lab by:	Date	Time	Rush Requested By: _____ Date _____ Must be approved by lab manager		
<i>LA</i>	9/3/10	1:20			

Notes/Comments:

24 hours

White and yellow pages should accompany samples to the laboratory. The client retains the pink page.

41170

**Summit Environmental Technologies, Inc.
Cooler Receipt Form**

Client: ORRco

Order Number: 1014089

Date Received: 9/3/10

Time Received: 11:20

Number of Coolers/Boxes: 1

N/A

Shipper: FED EX ☒ UPS ☐ DHL ☐ Airborne ☐ US Postal ☐ Walk-in ☐ Pickup ☐ Other: _____

Packaging: ☒ Peanuts ☐ Bubble Wrap ☐ Paper ☐ Foam ☐ None ☐ Other: _____

Tape on cooler/box:

☒ Y ☐ N ☐ N/A

Custody Seals Intact

☐ Y ☐ N ☒ N/A

C-O-C in plastic

☒ Y ☐ N ☐ N/A

Ice _____ Blue Ice _____

present / absent / melted ☒ N/A

Sample Temperature

25.4 °C ☐ N/A

C-O-C filled out properly

☒ Y ☐ N ☐ N/A

Samples in separate bags

☒ Y ☐ N ☐ N/A

Sample containers intact*

☒ Y ☐ N ☐ N/A

*If no, list broken sample(s): _____

Sample label(s) complete (ID, date, etc.)

☒ Y ☐ N ☐ N/A

Label(s) agree with C-O-C

☒ Y ☐ N ☐ N/A

Correct containers used

☒ Y ☐ N ☐ N/A

Sufficient sample received

☒ Y ☐ N ☐ N/A

Bubbles absent from 40 mL vials**

☐ Y ☐ N ☒ N/A

** Samples with bubbles less than the size of a pea are acceptable.

Was client contacted about samples

☐ Y ☐ N

Will client send new samples

☐ Y ☐ N

Client contact: _____

Date/Time: _____

Logged in by: APM

Comments: _____



SUMMIT
ENVIRONMENTAL TECHNOLOGIES, INC.
Analytical Laboratories

LABORATORY REPORT

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September 07, 2010

Client: ORRCO
Address: 4150 N. Suttle Road
Portland, OR 97217

Date Collected: 8/26/2010
Date Received: 9/3/2010
Project #: EMRI PCB-12
Client ID #: Tank 12
Laboratory ID #: 1014089-01
Matrix: Liquid

<u>Parameter</u>	<u>Method</u>	<u>Results</u>	<u>Date of Analysis</u>
Flash Point	1010	159°F	9/7/2010
PCB	8082	7.1ppm	9/7/2010

QA Manager: _____

PROGRESS REPORT FOR EPA - I

The following is a record of events from the clean up efforts at the EMRI facility, located at 11535 North Force Avenue, Portland, Oregon, 97217. During each phase of the clean up, the details and procedures set forth in the original Scope of Work Plan written by the independent contractor, CCS, were strictly adhered to.

Tuesday, March 2, 2010

Work began at the EMRI facility. Work accomplished on this day consisted of:

- Pumping the liquid oil from Tank 17 into Tank 12
- Pumping the liquid oil from Tank 18 into Tank 12
- Sludge and solids were removed from the bottom of Tank 17 (these solids were drummed for storage)
- Sludge and solids were removed from the bottom of Tank 18 (these solids were drummed for storage)

Wednesday, March 3, 2010

Work continued at the EMRI facility. Work accomplished on this day consisted of:

- A hot water wash was completed on Tank 17 to remove any remaining oil or solids from the tank. This wash water was pumped into Tank 12
- A hot water wash was completed on Tank 18 to remove any remaining oil or solids from the tank. This wash water was pumped into Tank 12
- The first diesel solvent flush was completed on Tank 17 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/T17-01. Laboratory ID: A10C035-01)*
- The second diesel solvent flush was completed on Tank 17 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/T17-02. Laboratory ID: A10C036-01)*

Thursday, March 4, 2010

Work continued at the EMRI facility. Work accomplished on this day consisted of:

- The third and final diesel solvent flush was completed on Tank 17 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/T17-03. Laboratory ID: A10C044-01) - **This completed the cleaning of Tank 17.***
- The first diesel solvent flush was completed on Tank 18 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/T18-01. Laboratory ID: A10C052-01)*
- The second diesel solvent flush was completed on Tank 18 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/T18-02. Laboratory ID: A10C057-01)*
- The third and final diesel solvent flush was completed on Tank 18 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/T18-03. Laboratory ID: A10C057-02) - **This completed the cleaning of Tank 18***

Friday, March 5, 2010

Work continued at the EMRI facility. Work accomplished on this day consisted of:

- Pumping the liquid oil and tank bottoms from Tank 25 into Tank 12
- Pumping the liquid oil and tank bottoms from Tank 26 into Tank 12
- Pumping the liquid oil and tank bottoms from Tank 27 into Tank 12

Monday, March 8, 2010

Work continued at the EMRI facility. Work accomplished on this day consisted of:

- A hot water wash was completed on Tank 25 to remove any remaining oil or solids from the tank. This wash water was pumped into Tank 12
- A hot water wash was completed on Tank 27 to remove any remaining oil or solids from the tank. This wash water was pumped into Tank 12
- The first diesel solvent flush was completed on Tank 27 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T27-01. Laboratory ID: A10C085-01)*
- The second diesel solvent flush was completed on Tank 27 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T27-02. Laboratory ID: A10C085-02)*

- The third and final diesel solvent flush was completed on Tank 27 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T27-03. Laboratory ID: A10C089-01) - **This completed the cleaning of Tank 27***

Tuesday, March 9, 2010

Work continued at the EMRI facility. Work accomplished on this day consisted of:

- The first diesel solvent flush was completed on Tank 25 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T25-01. Laboratory ID: A10C103-01)*
- The second diesel solvent flush was completed on Tank 25 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T25-02. Laboratory ID: A10C108-01)*
- The third and final diesel solvent flush was completed on Tank 25 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T25-03. Laboratory ID: A10C108-02) - **This completed the cleaning of Tank 25***

Wednesday, March 10, 2010

Work continued at the EMRI facility. Work accomplished on this day consisted of:

- A hot water wash was completed on Tank 26 to remove any remaining oil or solids from the tank. This wash water was pumped into Tank 12
- The first diesel solvent flush was completed on Tank 26 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T26-01. Laboratory ID: A10C128-02)*
- The second diesel solvent flush was completed on Tank 26 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T26-02. Laboratory ID: A10C128-02)*

Thursday, March 11, 2010

Work continued at the EMRI facility. Work accomplished on this day consisted of:

- The third and final diesel solvent flush was completed on Tank 26 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T26-03. Laboratory ID: A10C142-01) - **This completed the cleaning of Tank 26***

- Pumping the liquid oil and tank bottoms from Tank 29 into Tank 12
- A hot water wash was completed on Tank 29 to remove any remaining oil or solids from the tank. This wash water was pumped into Tank 12
- The first diesel solvent flush was completed on Tank 29 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T29-01. Laboratory ID: A10C154-04)*
- The second diesel solvent flush was completed on Tank 29 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T29-02. Laboratory ID: A10C154-05)*
- The third and final diesel solvent flush was completed on Tank 29 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T29-03. Laboratory ID: A10C170-01 - **This completed the cleaning of Tank 29**)*
- Pumping the liquid oil and tank bottoms from Tank 30 into Tank 12
- A hot water wash was completed on Tank 30 to remove any remaining oil or solids from the tank. This wash water was pumped into Tank 12
- The first diesel solvent flush was completed on Tank 30 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T30-01. Laboratory ID: A10C154-01)*
- The second diesel solvent flush was completed on Tank 30 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T30-02. Laboratory ID: A10C154-02)*

Friday, March 12, 2010

Work continued at the EMRI facility. Work accomplished on this day consisted of:

- The third and final diesel solvent flush was completed on Tank 30 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T30-03. Laboratory ID: A10C154-03) - **This completed the cleaning of Tank 30***
- A hot water wash was completed on Tank 19 to remove any remaining oil or solids from the tank. This wash water was pumped into Tank 12
- The first diesel solvent flush was completed on Tank 19 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T19-01. Laboratory ID: A10C183-01)*
- The second diesel solvent flush was completed on Tank 19 (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-T19-02. Laboratory ID: A10C183-02)*

Saturday, March 13, 2010

Work continued at the EMRI facility. Work accomplished on this day consisted of:

- The third and final diesel solvent flush was completed on Tank 19 (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-T19-03. Laboratory ID: A10C189-01) - **This completed the cleaning of Tank 19**
- A hot water wash was completed on Tank 10 to remove any remaining oil or solids from the tank. This wash water was pumped into Tank 12

Monday, March 15, 2010

Work continued at the EMRI facility. Work accomplished on this day consisted of:

- The first diesel solvent flush was completed on Tank 10 (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-T10-01. Laboratory ID: A10C193-01)
- The second diesel solvent flush was completed on Tank 10 (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-T10-02. Laboratory ID: A10C193-02)
- The third and final diesel solvent flush was completed on Tank 10 (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-T10-03. Laboratory ID: A10C202-01) - **This completed the cleaning of Tank 10**

Tuesday, March 16, 2010

Work continued at the EMRI facility. Work accomplished on this day consisted of:

- The first diesel solvent flush was completed on the "front" tank farm lines (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-Line Flush-01. Laboratory ID: A10C223-01)

Wednesday, March 17, 2010

Work continued at the EMRI facility. Work accomplished on this day consisted of:

- The second diesel solvent flush was completed on the "front" tank farm lines (sample taken to the laboratory for analysis). (Sample ID: EMRI/8510118-Line Flush-02. Laboratory ID: A10C240-01)

- The third and final diesel solvent flush was completed on the “front” tank farm lines (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-Line Flush-03. Laboratory ID: A10C251-01) - This completed the cleaning of the “front” tank farm lines*

Thursday, March 18, 2010

Work continued at the EMRI facility. Work accomplished on this day consisted of:

- The first diesel solvent flush was completed on the front main tank farm lines (the incoming portion to the re-refinery) and the re-refinery processing systems (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-MPLF-01. Laboratory ID: A10C262-01). ALSO SEE ATTACHED DESCRIPTION OF HOW THE RE-REFINERY PROCESSING SYSTEMS WERE FLUSHED.*
- The second diesel solvent flush was completed on the front main tank farm lines (the incoming portion to the re-refinery) and the re-refinery processing systems (sample taken to the laboratory for analysis). *(Sample ID: EMRI/8510118-MPLF-02. Laboratory ID: A10C262-02). ALSO SEE ATTACHED DESCRIPTION OF HOW THE RE-REFINERY PROCESSING SYSTEMS WERE FLUSHED.*
- The third and final diesel solvent flush was completed on the front main tank farm lines (the incoming portion to the re-refinery) and the re-refinery processing systems (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-MPLF-03. Laboratory ID: A10C262-03). ALSO SEE ATTACHED DESCRIPTION OF HOW THE RE-REFINERY PROCESSING SYSTEMS WERE FLUSHED. - This completed the cleaning of the front main tank farm lines (the incoming portion to the re-refinery) and the re-refinery processing systems*
- The first diesel solvent flush was completed on the back main tank farm lines (the outgoing lines from the re-refinery) (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-MPLB-01. Laboratory ID: A10C262-04). ALSO SEE ATTACHED DESCRIPTION OF HOW THE RE-REFINERY PROCESSING SYSTEMS WERE FLUSHED.*
- The second diesel solvent flush was completed on the back main tank farm lines (the outgoing lines from the re-refinery) (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-MPLB-02. Laboratory ID: A10C262-05). ALSO SEE ATTACHED DESCRIPTION OF HOW THE RE-REFINERY PROCESSING SYSTEMS WERE FLUSHED.*
- The third and final diesel solvent flush was completed on the back main tank farm lines (the outgoing lines from the re-refinery) (sample taken to the laboratory for analysis). *See Attached Analytical (Sample ID: EMRI/8510118-MPLB-03. Laboratory ID: A10C262-06). ALSO SEE ATTACHED DESCRIPTION OF HOW THE RE-REFINERY*

PROCESSING SYSTEMS WERE FLUSHED. - This completed the cleaning of the back main tank farm lines (the outgoing lines from the re-refinery)

- The first diesel solvent flush was completed on the line from the re-refinery process to storage Tank 25, and exhausted into Tank 26 to be decontaminated afterwards (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-T25L-01. Laboratory ID: A10C266-01).
- The second diesel solvent flush was completed on the line from the re-refinery process to storage Tank 25 and exhausted into Tank 26 to be decontaminated afterwards (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-T25L-02. Laboratory ID: A10C266-02).
- The third and final diesel solvent flush was completed on the line from the re-refinery process to storage Tank 25 and exhausted into Tank 26 to be decontaminated afterwards (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-T25L-03. Laboratory ID: A10C266-03). - **This completed the cleaning of the line from the re-refinery process to storage Tank 25**
- The first diesel solvent flush was completed on the line from the re-refinery process to storage Tank 26 and exhausted into Tank 26 to be decontaminated afterwards (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-T26L-01. Laboratory ID: A10C266-04).
- The second diesel solvent flush was completed on the line from the re-refinery process to storage Tank 26 and exhausted into Tank 26 to be decontaminated afterwards (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-T26L-02. Laboratory ID: A10C266-05).
- The third and final diesel solvent flush was completed on the line from the re-refinery process to storage Tank 26 and exhausted into Tank 26 to be decontaminated afterwards (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-T26L-03. Laboratory ID: A10C266-06). - **This completed the cleaning of the line from the re-refinery process to storage Tank 26**
- The first diesel solvent flush was completed on the line from the re-refinery process to storage Tank 27 and exhausted into Tank 26 to be decontaminated afterwards (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-T27L-01. Laboratory ID: A10C266-07).
- The second diesel solvent flush was completed on the line from the re-refinery process to storage Tank 27 and exhausted into Tank 26 to be decontaminated afterwards (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-T27L-02. Laboratory ID: A10C266-08).
- The third and final diesel solvent flush was completed on the line from the re-refinery process to storage Tank 27 and exhausted into Tank 26 to be decontaminated afterwards (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID:

EMRI/8510118-T27L-03. Laboratory ID: A10C266-09). - This completed the cleaning of the line from the re-refinery process to storage Tank 27

Friday, March 19, 2010

Work continued at the EMRI facility. Work accomplished on this day consisted of:

- Pumping the liquid oil from Tank 26 into Tank 12 (this was the diesel flush used to decontaminate the lines to Tanks 25, 26, and 27 as described in the summary of work conducted on March 18).
- The first diesel solvent flush was completed on Tank 26 (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-TK26-02-01. Laboratory ID: A10C287-01).
- The second diesel solvent flush was completed on Tank 26 (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-TK26-02-02. Laboratory ID: A10C287-02).
- The third and final diesel solvent flush was completed on Tank 26 (sample taken to the laboratory for analysis). See Attached Analytical (Sample ID: EMRI/8510118-TK26-02-03. Laboratory ID: A10C287-03).

1-2-14
E-Mail Mike M.
This should do the
job - Request
But
Scan please

Description of the Process Used to Decontaminate the Re-Refinery (Actual Processing Equipment) at EMRI

The flash tank, column 1 including new packing, HE1, R206, R306, where opened up and cleaned out and reassembled prior to flushing the plant.

The actual flushing of the equipment occurred as follows, by CCS:

First, the line to the feed pump (at the very beginning of the path to the re-refinery) was disconnected, and a cam lock and a valve were installed where CCS could connect their diesel flushing hose.

The flash tank was filled with approximately 800 gallons of Diesel, and P3 was started in order to circulate and feed WFE1.

WFE1 was fed diesel with the rotor running, which allowed R203 to overfill into R201, flushing that unit.

Then, P206 was turned on, which fed WFE2 while its rotor was running, allowing R306 to overfill into R301, flushing it.

This was all sent to the recycle line which went back to the flush tank where the samples were collected to send to Apex Laboratories for analysis. This process was repeated three separate times, in accordance with the Self Implementing Decontamination Procedures set forth in CCS's original Scope of Work Plan.

To flush the diesel and water side of the operations, the heat in the flash tank was turned up, and the diesel went into R100, R5 and R6 which flushed these units. This was all sent to the recycle line as well, which went back to the flush tank where the samples were collected to send to Apex Laboratories for analysis. This process was repeated three separate times, in accordance with the Self Implementing Decontamination Procedures set forth in CCS's original Scope of Work Plan.

Finally, the lines to the storage tanks involved in the contamination (25, 26, and 27) were flushed in the same manner 3 separate times, and the samples from these flushes were collected and sent to Apex Laboratories for analysis.

Tank 31 was disconnected from the plumbing of the system, and blanked off in order to be locked out (the contents of this tank was greater than 50 ppm PCBs, so the material will stay within this tank pending disposal consideration).

The process described above incorporated all lines and equipment in the re-refinery that were in use during the time of the contamination.